

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
THE HIPSAVER COMPANY, INC.,	)	
	)	
Plaintiff / Counterclaim Defendant,	)	
	)	
v	)	Civil Action No. 05-10917 PBS
	)	
J.T. POSEY COMPANY,	)	
	)	
Defendant / Counterclaim Plaintiff.	)	
_____	)	

**PLAINTIFF'S FINAL WITNESS AND EXHIBIT LISTS**

Plaintiff The HipSaver Company, Inc. ("HipSaver") identifies the following witnesses whom it expects to call at trial and the following exhibits that it expects to offer into evidence at trial. These disclosures are subject to revision, and specifically do not include demonstrative exhibits (such as charts and summaries) that are based upon other admissible evidence.

**A. Identification of Witnesses**

HipSaver identifies the following witnesses whom it expects to call at trial:

Mr. Edward Goodwin  
Mr. Ernest Posey  
Ms. Victoria Lewis (may be by deposition)  
Dr. Roy J. Epstein, PhD  
Mr. Creighton Hoffman  
Dr. Wilson C. Hayes, PhD  
Dr. Edward Ebramzadeh, PhD  
Mr. Roy S. Carr (may be by deposition)

Dr. Jeffrey B. Burl, MD, CMD  
Mr. Charles Nail (may be by deposition)  
Ms. Helen Brogna  
Mr. Gary Reich  
Mr. Kevin Minissian  
Mr. Charles Sweeney

**B. Identification of Exhibits**

HipSaver identifies the exhibits on the attached **Exhibit A** as those that it expects to offer into evidence at trial.

Dated: Boston, Massachusetts  
May 15, 2007

Respectfully submitted,

THE HIPSAVER COMPANY, INC.  
By its Attorneys,

/s/ Courtney M. Quish

Lee Carl Bromberg  
BBO No.: 058480  
Edward J. Dailey  
BBO No.: 112220  
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**CERTIFICATE OF SERVICE**

I certify that this document has been filed through the Electronic Case Filing System of the United States District Court for the District of Massachusetts and will be served electronically by the court to the Registered Participants identified in the Notice of Electronic filing.

/s/ Courtney M. Quish  
Courtney M. Quish

02820/00502 668663.1

Exhibit A  
HipSaver's Final Trial Exhibit List

<b>Trial Exhibit #</b>	<b>Batesno</b>	<b>Summary</b>	<b>Doctype</b>	<b>Docdate</b>	<b>Authors</b>
001	EXH0001	Article re: hip protector use	Article	8/25/2005	Jeffrey B. Burl, MD, CMD James Centola, PT Alice Bonner, APRN-BC Colleen Burque, PTA
004	EXH0004	Guidelines for Environmental Infection Control in Health-Care Facilities	Report	00/00/2003	U.S. Dep't of Health and Human Services; CDC
005	EXH0005	Guidelines for Laundry in Health Care Facilities	Report	00/00/0000	U.S. Dep't of Health and Human Services; CDC
007	EXH0007	Settlement Agreement	Agreement	9/22/2004	Posey Goodwin
009	HS2 000046	Tampere, Finland tests	Report	08/00/2000	Kannus Parkkari; Poutala
010	HS2 000043	Hip Pads: Effective Fracture Prevention	Article	10/30/2000	George Gross; Tsan-Hui Chen; Carolyn Flaherty
012	EXH0012	Posey Hipsters	Advertisement	5/17/2005	Posey Co.
035	EXH0035	New Published Study Reports High Compliance Rates and No Hip Fractures with HipSaver	Website page	00/00/0000	HipSaver
055	HS2 000080 HA 000027	2001 - 2004 Tax Forms for Hipsaver	Tax Form	00/00/0000	
056	HS2 000082	2002 Tax Form for HipSaver	Tax Form	00/00/2002	
057	HS2 000084	2003 Tax Form for HipSaver	Tax Form	00/00/2003	
058	HS2 000086	HipSaver tax return 2004	Tax Form	00/00/2004	
061	EXH0061	Hip Protectors & The Laundry	Website pages	00/00/0000	HipSaver
065	G 000285	Force Attenuation Properties of Various Trochanteric Padding Materials Under Typical Falling Conditions of the Elderly	Article	00/00/1996	Parkkari; Kannus; Poutala; Vuori
081	PC 000852	Email forwarding Posey Impact Test Results	Report	7/26/2001	Yates, Jeffrey
085	EXH0085	Photos of Posey Hipster with laundry label showing	Photo	00/00/0000	
086	EXH0086	Photos of Posey Hipster with laundry label showing; product information	Photo	00/00/0000	
087	EXH0087	Photos of Posey Hipster with laundry label showing; product information	Photo and product info	00/00/0000	

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088	EXH0088	Photo of HipSaver hip protectors with laundry label showing	Photo	00/00/0000	
089	G 000184	Environmental Test Report on Various Hip Protectors	Report	8/7/2001	Garwood Laboratories
090	PC 000852	Email enclosing impact test results on Posey Hipster	Email enclosing report	7/27/2001	Yates, Jeffrey
091	G 000245	Environmental Test Report on Hip Protectors	Report	5/2/2001	Garwood Laboratories
092	PC 000894	Impact test results for various hip protectors	Bar graphs	00/00/0000	
093	G 000115	Environmental Test Report on Six Hip Protectors	Report	1/18/2005	Garwood Laboratories
094	G 000053	Environmental Test Report on Thirteen Hip Protectors	Report	3/31/2005	Garwood Laboratories
095	HS 000302	Photos of Posey Hipsters	Photo	00/00/0000	
096	PC 0001971	Hip protector test data; email from McGrath to Minns requesting additional info regarding test	Letter enclosing test report; email	10/8/2005	Minns, Julian; McGrath, Charleen
097	PC 000400	Posey product info / advertisement	Advertisement	00/00/0000	Posey Co.
098	PC 000799	Study: A Solution to Hip Fractures Using Performance Tested Hip Protectors	Report	08/00/2003	Gandhi, Bimal
099	PC 000373	Special Announcement" regarding unreliability of "white paper"	Press Release	00/00/0000	
100	HS 000303	Email from Hedman to Goodwin	Email	11/29/2004	Hedman, Tom
101	PC 000898	Meeting notes from meeting on problems with Posey Hipsters	Memo	4/25/2002	Rash, Lee
102	PC 001989	Email string regarding Hipsters	Email	2/24/2005	Nentrup, Randall
103	PC 001988	Email string regarding changing info in NCPS video	Email	4/29/2005	Lewis, Vicky
125	HS2 000325	HipSaver US Sales 2001-2005	Financial	00/00/0000	
129	HS2 000138	Letter enclosing impact test results of Goodwin hip pad	Letter	4/9/1996	Hayes, Wilson
134	HS2 000408	HipSaver Tax return 2003	Tax	00/00/2003	
135	HS2 000399	HipSaver Tax return 2002	Tax	00/00/2002	
136	HS2 000388	HipSaver Tax return 2001	Tax	00/00/2001	
143	EXH0143	Expert Report of Roy J. Epstein 09/25/2006	Pleading / Expert report	9/25/2006	Epstein, Roy
144	EXH0144	Expert Report of Creighton Hoffman and Philip Green	Pleading / Expert report	2/16/2006	Hoffman, Creighton; Green, Philp
145	EXH0145	Supplemental Report of Roy J. Epstein 10/31/2006	Pleading / Expert report	10/31/2006	Epstein, Roy
159	HS2 002198~f	NCPS video: Hip Protector information		00/00/0000	NCPS
166	EXH0166	Hayes Report to B&S	Report	9/22/2006	Hayes, Wilson
167	EXH0167	Hayes sur-rebuttal report	Report	11/9/2006	Hayes, Wilson

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500	COR 000001	Hoffman and Green report	Pleading	10/16/2006	Hoffman, Creighton; Green, Philip
501	COR 000368	Health Hospitals article	Article	7/17/2006	
502	COR 000394	Advertising, Conferences, Mailings	Corporate	00/00/0000	HipSaver
503	COR 000396	New Sales \$ for each advertising \$ spent	Financial	00/00/0000	HipSaver
504	HS 000003	Advertisement for Posey Fall Management and Bed Safety Products	Advertisement	00/00/0000	Posey Co.
505	HS 000071	Advertisement for Posey Hipster	Advertisement	00/00/0000	Posey Co.
506	HS 000107	Advertisement for Posey Hipsters	Advertisement	00/00/0000	Posey Co.
507	HS 000109	email titled: The ONLY SCIENTIFICALLY VALIDATED hip protector?	email	1/21/2004	Anderson, Brian
508	HS2 000001	Actual pair of Hipsaver Briefs (photo showing cross section)	Sample	00/00/0000	
509	HS2 000001a	Pair of hip protectors with pads removed	Sample	00/00/0000	
510	HS2 000008	Letter enclosing Posey Hipster mistakenly returned to HipSaver, and photos of same	Letter	5/2/2003	Oha, Michelle
511	HS2 000038	Hip Protector Compliance: A 13-Month Study on Factors and Cost in a Long-Term Care Facility	Article	09/00/2003	Burl, Jeffrey; Centola, James; Bonner, Alice; Burque, Colleen
512	HS2 000043	Hip Pads: Effective Fracture Prevention	Article	10/30/2000	Gross, George; Chen, Tsan-Hui; Flaherty, Carolyn
513	HS2 000058	Posey Hipsters ad	Advertisement	5/17/2005	
514	HS2 000059	Posey Hipsters ad	Advertisement	5/17/2005	
515	HS2 000063	Ad - Posey Hipsters Help Protect Against Injury from Falls	Advertisement	00/00/0000	
516	HS2 000073	HipSaver order form	Invoice	00/00/0000	
517	HS2 000074	HipSaver order form	Invoice	00/00/0000	
518	HS2 000075	HipSaver order form	Invoice	5/9/2001	
519	HS2 000130	Hip Pads: Effective Fracture Prevention	Article	10/30/2000	Gross, George; Chen, Tsan-Hui; Flaherty, Carolyn
520	HS2 000324	Photocopy of file folder labeled: #26 Sales [illegible] Costs	File folder	00/00/0000	
521	HS2 000326	HipSaver Unit Cost Sheet for US Sales 2005	Cost Sheet	00/00/0000	
522	HS2 000387	Photocopy of file folder labeled: #29 Financials	File folder	00/00/0000	
523	HS2 000426	Handwritten Ledger	Ledger	00/00/0000	
524	HS2 000438	Handwritten Ledger	Ledger	00/00/0000	

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525	HS2 000455	Handwritten Ledger	Ledger	00/00/0000	
526	HS2 000476	Handwritten Ledger	Ledger	00/00/0000	
527	HS2 000496	Handwritten Ledger	Ledger	00/00/0000	
528	HS2 000518	HipSaver Co. Financial Statement Worksheet for YTD 12/31/2004	Financial Statement	9/15/2005	
529	HS2 000520	HipSaver Co. YTD General Ledger	Ledger	9/15/2005	
530	HS2 000532	HipSaver Co. Bank of America Savings Account Analysis	Savings Account Analysis	12/31/2004	
531	HS2 000533	Annual Depreciation Report for the Fiscal Year Ended 12/31/2004	Depreciation Report	9/15/2005	
532	HS2 000536	HipSaver Co. Bank Reconciliation	Bank Reconciliation	12/31/2004	
533	HS2 000537	Payroll journals and Employer Tax returns	Payroll and Employer Tax documents	12/31/2004	
534	HS2 000543	Financial Statement Worksheets and General Ledger	Worksheets and Ledger	12/31/2003	
535	HS2 000546	Hipsaver Co. YTD General Ledger	Ledger	00/00/2003	
536	HS2 000553	Handwritten note listing HipSaver's 2003 Financial situation	Note	00/00/2003	
537	HS2 000554	HipSaver Co. Bank Reconciliation	Bank Reconciliation	12/31/2003	
538	HS2 000555	HipSaver Co. Annual Depreciation Report for the Fiscal Year Ended 12/31/2003	Depreciation Report	9/11/2004	
539	HS2 000557	HipSaver SEP Calculation, Payroll Tax, Quarter Wage Summary	Payroll documents	12/31/2003	
540	HS2 000560	HipSaver Co. Financial Statement Worksheet for the Year to Date period ending 12/31/2002	Financial Statement	12/31/2003	
541	HS2 000562	HipSaver Co. Year-to-date General Ledger For 01/03/2002 to 12/31/2002	Ledger	9/16/2003	
542	HS2 000571	HipSaver Bank Statement as of 12/31/2002, Bank Balance as of 12/31/2002	Bank Statement	12/31/2002	
543	HS2 000572	HipSaver Co. Annual Depreciation Report for the FY ended 12/31/2002, Retired Assets Report	Depreciation Report, Retired Assets Report	9/2/2003	
544	HS2 000575	HipSaver Co. Salary Analysis	Salary Analysis	12/31/2002	
545	HS2 000576	HipSaver Co. Finanacial Statement Worksheet for YTD period ending 12/31/2001	Financial Statement	9/1/2002	
546	HS2 000578	HipSaver Co. YTD General Ledger for 01/01/01 to 12/31/01	Ledger	9/1/2002	
547	HS2 000584	Handwritten note listing outstanding checks	Note	12/31/2001	
548	HS2 000585	HipSaver Co. Annual Depreciation Report For the FY ended 12/31/01	Depreciation Report	1/30/2002	

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549	HS2 000804	FW: Posey Hipsters brand hip protectors	email	10/15/2004	Hynous, Liz
550	HS2 000808	Advertisement for Posey Hipsters	Advertisement	00/00/0000	Posey Co.
551	HS2 000818	Advertisement for Posey EZ On Hipsters	Advertisement	00/00/0000	Posey Co.
552	HS2 001517	Journal of Biomechanical Engineering: Energy-Shunting Hip Padding System Attenuates Femoral Impact Force in a Simulated Fall	Article	11/00/1995	Robinovitch, S.N.; Hayes, W.C; McMahon, T.A.
553	HS2 001554	Letter enclosing Hipsters for participation in NCPS test	Letter	7/30/2003	Lewis, Victoria
554	HS2 002074	HipSaver Tax Return 1995		00/00/1995	
555	HS2 002079	HipSaver Tax Return 1996		00/00/1996	
556	HS2 002079	HipSave tax return 1996		00/00/1996	
557	HS2 002083	HipSaver Tax Return 1997		00/00/1997	
558	HS2 002088	HipSaver Tax Return 1998		00/00/1998	
559	HS2 002092	HipSaver Tax Return 1999		00/00/1999	
560	HS2 002095	HipSaver Tax Return 2000		00/00/2000	
561	HS2 002099	Protective Properties of Two Brands of Hip Protectors After Repeated Laundering - VISN 8 Patient Safety Center of Inquiry	Study/Article	00/00/0000	Stalhandske, Erik
562	HS2 002160	HipSaver Tax return 2005 - Produced in CD production of 09/27/2006		00/00/2005	
563	HS2 002294	CDC Guideline: Laundry: Washing Infected Material	Guideline	11/18/2000	CDC
564	HS2 002320	Declaration of Ernest M. Posey	Pleading	7/29/2004	Posey, Ernest
565	HS2 002328	Posey Fall Management and Bed Safety Products catalog	Advertisement / Catalog		
566	HS2 002360	Posey Healthcare Product Selection Guide catalog	Advertisement / Catalog		
567	HS2 002428	Posey 2005 Healthcare Product Selection Guide catalog	Advertisement / Catalog	00/00/2005	
568	HS2 002504	Posey 2006 Healthcare Product Catalog	Advertisement / Catalog	00/00/2006	
569	HS2 002605~f	HipSaver US Sales 2001-2005	Financial		HipSaver
570	HS2 002606	HipSaver certificate of incorporation	Certificate of incorporation	5/3/2007	
571	HS2 002607	FDA 2007 Annual Registration of Device Establishment	Registration certificate	00/00/2007	
572	PC 000365	Settlement Agreement	Pleading	9/22/2004	
573	PC 000400	Advertisement / Product info for Posey Hipsters Posey advertisements	Advertisement / Product info	00/00/0000	Posey Co.

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574	PC 000406	Advertisement / Product info for Posey Hipsters		00/00/0000	
575	PC 000408	Advertisement / Product info for Posey Hipsters		00/00/0000	
576	PC 000809	Sales report spanning 2001 to September 2005	Sales Report	00/00/2005	
577	PC 000853	Impact Data regarding Posey Hipsters	email	7/27/2001	Yates, Jeffrey
578	PC 000919	FW: Posey Hipsters consideration of poron foam/ cost considerations	email	9/25/2003	Carr, Roy
579	PC 001022	Email re: wash tests	E-mail	3/23/2005	Keefe, Mike
580	PC 001025	Posey Hipsters ad	Advertisement	00/00/0000	
581	PC 001026	Posey Hipsters Proven Effective in Laboratory Test	Advertisement	00/00/0000	
582	PC 001027	Posey Restraint Alternatives 2001 / fall prevention ad	Catalog	00/00/2001	
583	PC 001029	Posey Care Alternatives Division 2002	Catalog	00/00/2002	
584	PC 001033	Posey Care Alternatives Division - Fall Management / Fall Prevention - Hipsters, citing Garwood July 2001 test 2003 Posey care alternatives catalog~Hipster advertisements	Catalog	00/00/2003	
585	PC 001036	Posey Healthcare Product Selection Guide	Catalog	00/00/2004	
586	PC 001038	Posey 2005 Healthcare Product Selection Guide	Catalog	00/00/2005	
587	PC 001040	Selected pages from the Posey 2006 catalog	Marketing	00/00/2006	
588	PC 001057	Posey Hipsters package inserts	Marketing	00/00/1999	
589	PC 001067	Posey EZ On Hipsters package inserts	Marketing	00/00/0000	
590	PC 001073	Posey ad For Some Residents Every Fall is A Big One	Advertisement	00/00/0000	
591	PC 001077	Draft of Posey ad	Advertisement	11/14/2004	
592	PC 001081	Draft of Posey ad	Advertisement	3/10/2005	
593	PC 001468	Sales records for 2001 - September of 2005 Summary of Posey Sales 2001-2005	Ledger	00/00/0000	
594	PC 001473	Ad in HME News for Posey Hipsters sweatpants and shorts HME news October 2005, Posey advertisement	Advertisement	10/00/2005	
595	PC 001736	2006 Posey Healthcare Product Selection Guide 2006 Healthcare Product catalog	Catalog	00/00/2006	
596	PC 001743	Draft of Hipster ad	Advertisement	3/10/2005	
597	PC 001747	Draft of Hipster ad	Advertisement	00/00/0000	
598	PC 001754	Draft of Posey Hipsters with High Durability Pads ad M6127	Advertisement	9/28/2004	
599	PC 001805	Posey Hipsters III ad, citing July 2001 Garwood test	Advertisement	00/00/0000	



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600	PC 001806	Draft of Hipster ad, Posey Hipsters HELP Protect Against Injury from Falls	Advertisement	00/00/0000	
601	PC 001810	Draft of Hipster ad, Posey Hipsters HELP Protect Against Injury from Falls	Advertisement	00/00/0000	
602	PC 001817	Posey Hipsters ad citing CDC and Rubenstein	Advertisement	00/00/1999	
603	PC 001818	Clinical References Supporting the Use of Hip Protectors	Advertisement	00/00/0000	
604	PC 001829	Posey Hipsters ad (M6127)	Advertisement	00/00/2004	
605	PC 001832	Posey EZ On Hipsters, and ad form (M5017)	Advertisement	00/00/2002	
606	PC 002169	Effects of Loading Rate on Strength of the Proximal Femur	Article	00/00/1994	Courtney, A.C.; Wachtel, E.F.; Myers, E.R.; Hayes, W.C.
607	PC 002260	Etiology and Prevention of Age-Related Hip Fractures	Article	00/00/1996	Hayes, W.C.; Myers, E.R.; Robinovitch, S.N.; Van Den Kroonenberg, A.; Courtney, A.C.; McMahon, T.A.
608	PC 002278	Comparison of Force Attenuation Properties of Four Different Hip Protectors Under Simulated Falling Conditions in the Elderly: An In Vitro Biomechanical Study	Article	00/00/1999	Kannus, P.;Parkkari, J.;Poutala, J.
609	PC 002351	Energy-Shunting External Hip Protector Attenuates the Peak Femoral Impact Force below the Theoretical Fracture Threshold: An In Vitro Biomechanical Study under Falling Conditions of the Elderly	Article	00/00/1995	Parkarri, Jari; Kannus, Pekka; Heikkila, Jussi; Poutala, Jarmo; Sievanen, Harri; Vuori, Ilkka
610	PC 002367	Prediction of Femoral Impact Forces in Falls on the Hip	Article	11/00/1991	Robinovitch, S.N.;Hayes, W.C.; McMahon, T.A.
611	PC 002381	Force Attenuation in Trochanteric Soft Tissues During Impact from a Fall	Article	12/1/1994	Robinovitch, Stephen; McMahon, Thomas; Hayes, Wilson
612	PC 002486	Advertisement for Posey Hipsters; illegible excerpt from The Lancet; Hip Fracture Disease: Coping with a contemporary epidemic; Effect of External Hip Protectors on Hip Fractures	Advertisement	00/00/0000	
613	PC 002754	Posey 2005 Healthcare Product Selection Guide	Catalog	00/00/2005	

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614	PC 002893	Sales of Posey Hipsters, 2001 - 2005	Sales data	00/00/0000	
615	PC 002899	Domestic Sales of Posey Hipsters, 2004 - 2005	Sales data	1/31/2006	
616	PC 002998	Monthly Hipster Sales 2004 to 2005	Financial data	00/00/0000	
617	PC 003000	Advertisement for Posey Hipsters	Advertisement	00/00/0000	Posey Co.
618	PC 003002	Advertisement for Posey Hipsters	Advertisement	00/00/0000	Posey Co.
619	PC 003006	Advertisement for Posey Hipsters	Advertisement	00/00/0000	Posey Co.
620	PC 003382	Hipsaver Request #15 - Sales and Costs of Designated Fall Management Products 2001 to 2005	Sales informaiton	00/00/0000	
621	PC 003397	Hipsaver Request #16 - Sales and Costs of Hip Protection Products 2001 to 2005	Sales informaiton	00/00/0000	
622	PC 003422	Hipsaver Request #17 - Bill to Customer Names and Addresses	Sales informaiton	00/00/0000	
623	PC 003429	Hipsaver Request #17 - Ship to Address and Hip Protector Sales	Sales informaiton	00/00/0000	
624	PC 003853	Hipsaver Request #17 - Payment Application Data~~PC 003853- PC 003962~~Produced on CD	Sales informaiton	00/00/0000	
625	PC 003963	CD containing Hipster invoices; duplicate CD at PC 003964	Disk	00/00/0000	
626	PC 003965	CD containing data re: Hipster RMAs (comments re: returns); PC 003965-PC 004528	Disk	00/00/0000	
627	PC 004529	CD containing data re: Posey Hipster RMAs (comments re: returns)	Disk	00/00/0000	
628	PC 005153	Posey 2004 S-Corporation Return	Tax return	00/00/2004	
629	PC 005180	Posey 2003 S-Corporation Return	Tax return	00/00/2003	
630	PC 005204	Posey 2002 S-Corporation Return	Tax return	00/00/2002	
631	PC 005232	Posey 2001 S-Corporation Return	Tax return	00/00/2001	
632	PC 005722	Hipsters advertisement		00/00/0000	
633	PC 005724	Posey Hipster catalog/advertisement		00/00/0000	
634	PC 005736	CD containing Hipsters returns 2001-2005		00/00/0000	
635	PC 005842	Place holder for CD of Excel spreadsheet also found at PC 005817 - PC 005841	CD	00/00/0000	
636	PC 005868	Preliminary summary of Hayes' opinions / Hayes expert report	Letter / Report	6/14/2004	Hayes, Toby
637	PC 005914	Email exchange re picture of Posey pad showing incorrect positioning	Email	12/4/2006	Morseburg, Doug
638	PC 005927	Color Copy of 2002 Catalog / advertisement	Catalog / Advertisement	00/00/2002	

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639	RJE 000138	Expert Designation Including Report of Gary Reich	Pleading	2/16/2006	Reich, Gary
640	RJE 000153	Top 25 nursing home chains	Article	09/00/2002	Appleby, Jean
641	RJE 000154	Printout from <a href="http://www.hipprotector.com">www.hipprotector.com</a> website	Website	00/00/0000	
642	RJE 000157	Printout from CDC website	Website	00/00/0000	
643	WCH 000073	Am. J of Phys Article: How to hit home runs: Optimum baseball bat swing parameters for maximum range trajectories	Article	11/00/2003	Sawicki, Gregory; Hubbard, Mont; Stronge, William
644	WCH 000084	Composite Structures article: Performance Assessment of Wood, Metal, and Composite Baseball bats	Article	00/00/2001	Shenoy, Mahesh; Smith, Lloyd; Axtell, John
645	WCH 000092	Journal of Biomechanical Engineering article: Dynamic Models for Sideways Falls from Standing Height	Article	09/00/1995	van den Kroonenberg; Hayes, W.C.; McMahon, T.A.
646	WCH 000178	Hayes Rebuttal Report to Ebramzadeh report (unsigned)	Letter / Report	8/14/2004	Hayes, Toby
647	HS2 000298	HipSaver Slimfit model	Hip protector	00/00/0000	
648		2007 version of HipSaver pad (to be provided)	Hip protector pad	00/00/0000	
649		DermaSaver skin protectors (three models - to be provided)	Hip protectors	00/00/0000	
650		DermaSaver Product Guide (to be provided)	Product Guide	00/00/0000	
651		Posey first generation Hipster (to be provided)	Hip protector	00/00/0000	
652		Graphic of pelvic bones (chalk to be provided)	Graphic	00/00/0000	
653		HipSaver website pages	Website	00/00/0000	
654		Doing Business in Massachusetts reports (Alimed, Kindred, Life Care, McKesson, Cardinal, Medline, Gulf South, Sun Health, Manor Care, VHA) (not yet received from Secretary of the Commonwealth)	Reports	00/00/0000	
655		Hayes powerpoint presentation (to be provided)	Presentation	00/00/0000	
656		Epstein powerpoint presentation (to be provided)	Presentation	00/00/0000	
657		HipSaver's Stipulated Facts	Pleading		